



Lisa Kennedy  
Secretary  
Alaska Shorebird Group

22 January 2019

NPR-A IAP/EIS Scoping Comments  
State Director, Bureau of Land Management  
Alaska State Office  
222 West 7th Avenue, Mailstop 13  
Anchorage, AK 99513  
Fax: (907) 271-5479

Dear BLM State Director:

The stated goals of the Alaska Shorebird Group (ASG), established in 1995, are to raise the public's awareness of shorebirds; to promote research, monitoring, management, conservation, and education relevant to shorebirds in Alaska; to provide a forum for the exchange of information about shorebirds among biologists, managers, and the public; and to promote the range-wide management and conservation of shorebirds, which spend part of their lifecycle in Alaska. ASG members include representatives from federal and state agencies, non-government organizations, academia, and the general public.

Because the potential for oil and gas development to impact shorebirds is an issue of concern to our membership, the Executive Committee of the ASG recently convened to respond to the request for scoping comments to guide development of a new Integrated Activity Plan/Environmental Impact Statement (IAP/EIS) for the National Petroleum Reserve-Alaska (NPR-A). Six of the eight members of the executive committee unanimously agreed to submit the following position statement, which includes information on the importance of the NPR-A (particularly the Teshekpuk Lake Special Area) to shorebirds and likely impacts from development. Two members of the executive committee are furloughed federal employees and therefore could not be reached at this time.

### **Background**

One of the largest wetland areas in the world is found within the NPR-A. This wetland complex of ponds, lakes, rivers, streams, lagoons and barrier islands provide nesting, feeding and staging habitat for migratory shorebird populations of national and international significance. Shorebirds that utilize the NPR-A migrate south via all four major North American flyways, as well as the Central Pacific Flyway and the East Asian-Australasian Flyway. During annual migrations, shorebirds migrate through or winter throughout the Lower 48, and many travel much farther, including south and east to Central and South America as well as south and west to Mainland China, Taiwan, Japan, Republic of Korea, Australia, and New Zealand.

The NPR-A includes seven designated Important Bird Areas (IBAs), two of which are identified as having global significance.<sup>1</sup> More than two dozen species of shorebird breed in the NPR-A – many of which are declining and of high importance.<sup>2</sup> Several sites have been identified as candidates for inclusion in the Western Hemisphere Shorebird Reserve Network. Qupaluk, a 21,100 hectare site located northeast of Teshekpuk Lake, was recognized as an East Asian-Australasian Flyway site of international importance, because it meets the following criteria: 1) supports threatened Steller's (*Polysticta stelleri*) and Spectacled (*Somateria fischeri*) eiders, 2) includes nearly 30,000 breeding migratory waterbirds, and 3) supports >1% of the estimated 490,000 Dunlin (*Calidris alpina arctica*) that occur in the world.<sup>3</sup>

Here we list some key findings (and provide accompanying figures) from studies that demonstrate the exceptional value of the NPR-A and its Special Areas for shorebirds that utilize this region as a breeding and staging ground:

1. Andres et al. (2012)<sup>3</sup> and Bart et al. (2013)<sup>4</sup> documented that the highest densities of shorebirds in the circumpolar Arctic are found in the region around Teshekpuk Lake and NPR-A in general. Approximately 573,000 (ca. 10%) of the estimated 6 million shorebirds found across the NPR-A use the Teshekpuk Lake Special Area (TLSA). The highest densities of shorebirds in the Teshekpuk Lake area are clustered around both the south and north sides of Teshekpuk Lake (Figure 1). It is the ASG's position that the area around Teshekpuk Lake should be made unavailable for oil/gas leasing, as is the case in the 2013 ROD for the Northeast NPR-A IAP/EIS.

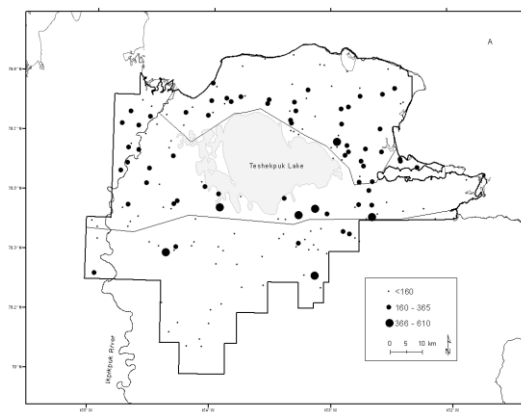


Figure 1. Categorical density of shorebirds (birds/km<sup>2</sup>) breeding in the Teshekpuk Lake Special Area (2006-08) for all shorebirds (from Figure 2 of Andres et al. 2012).

<sup>1</sup> Currently designated IBAs within the NPR-A: Teshekpuk Lake Area, Colville River Delta, Lower Colville River, Beaufort Sea Nearshore, Barrow Canyon and Smith Bay, Chukchi Sea Nearshore, and Kasegaluk Lagoon.

<sup>2</sup> The worldwide populations of many shorebird species have recently declined. Declines are suspected or have been documented for nine shorebird species that regularly breed on Alaska's coastal plain. Five of these species have been classified as species of high or great concern, and the majority of the U.S breeding populations of seven species occur on the coastal plain. See Johnson, J., et al, "Distribution of Breeding Shorebirds on the Arctic Coastal Plain of Alaska," *Arctic* Vol 60. No 3 (September 2007), and Alaska Shorebird Group. Alaska Shorebird Conservation Plan. Version III. Alaska Shorebird Group, Anchorage, AK (in press).

<sup>3</sup> Burns, C.T., and R.B. Lanctot. 2016. Information sheet on the Qupaluk East Asian-Australasian Flyway Network Site.

<sup>4</sup> Andres, B.A., J.A. Johnson, S.C. Brown, R.B. Lanctot. 2012. Shorebirds breeding in unusually high densities in the Teshekpuk Lake Special Area, Alaska. *Arctic* 65:411-420. Bart, J., R.M. Platte, B. Andres, S. Brown, J.A. Johnson, and W. Larned. 2013. Importance of the National Petroleum Reserve—Alaska for aquatic birds. *Conservation Biology* 27:1304-1312.

2. The TLSA supports significant percentages of populations of three species of shorebird: Dunlin (*arcticola* subsp.) 19%; Black-bellied Plover 10%; and Semipalmated Sandpiper (western population) 10% (Andres et al. 2012). These numbers easily qualify this site as a Western Hemispheric Shorebird Reserve Network (WHSRN) of international significance.
3. Overall, nest densities of breeding birds (including shorebirds) at two sites in the TLSA (Olak and on the Ikpikpuk River) were significantly higher compared to six other sites located along a 400-km long portion of the Arctic Coastal Plain of Alaska (Liebezeit et al., 2011<sup>5</sup>, Liebezeit and Zack, unpublished; Figure 2).

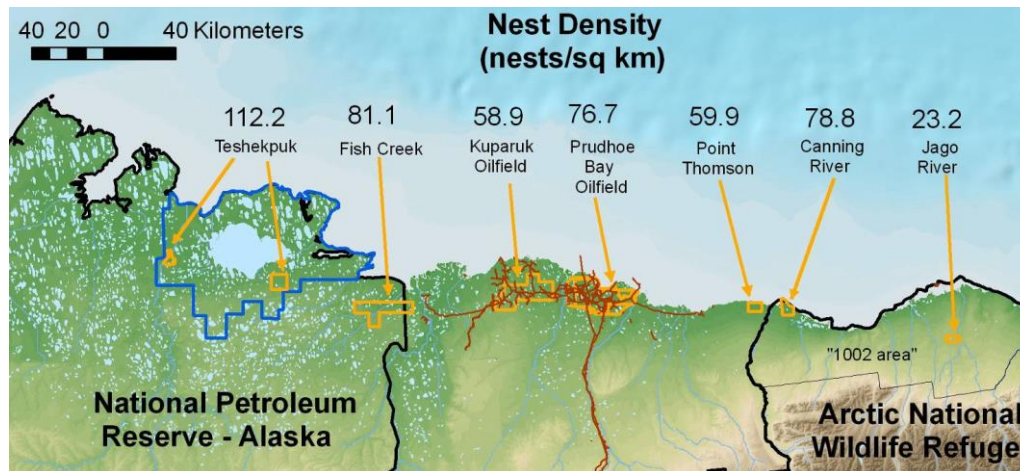


Figure 2. Overall bird nest densities at sites on the Arctic Coastal Plain of Alaska where data were collected using a standardized protocol (from Liebezeit et al. 2011; Liebezeit and Zack, unpublished data).

4. Studies have consistently shown higher nest survivorship for some shorebird species at a site in the TLSA compared to oil-developed sites to the east (Liebezeit et al. 2009<sup>6</sup>, Liebezeit et al. 2011<sup>4</sup>). In the most recent assessment combining long-term data sets from two remote sites within the TLSA and the two largest oilfields (Kuparuk and Prudhoe Bay), shorebirds have higher nest survivorship at TLSA sites compared to oilfield sites (Liebezeit and Zack, unpublished data).
5. Liebezeit et al. (2009)<sup>5</sup> found that two species of shorebirds (Red Phalarope and Red-necked Phalarope) nesting within 5 kilometers of oil and gas infrastructure sustained significantly higher rates of nest predation than nests farther from oil and gas infrastructure. The very high natural variation nest predation in and among sites, and between years across the Arctic, precluded further identification of statistical effects on other species. Nonetheless, it is clear that heightened risk of predation near oil and gas infrastructure can have a strong negative impact on nesting migratory birds. This 5 km zone from infrastructure that acts as a strong attractant to predators (either from food or

<sup>5</sup> Liebezeit, J.R., G.C. White, and S. Zack. 2011. Breeding ecology of birds at Teshekpuk Lake: a key habitat site on the Arctic Coastal Plain of Alaska. *Arctic* 64 (1): 32-44.

<sup>6</sup> Liebezeit, J.R., S.J. Kendall, P. Martin, D. Payer, C.B. Johnson, T. McDonald, A. Wildman, S. Brown, W. Streever, and S. Zack. 2009. Influence of human development and predators on nest survival of tundra birds, Arctic Coastal Plain Alaska. *Ecological Applications* 19(6): 1628-1644.

potential nesting and denning sites; see Liebezeit et al. 2009, Table 3) should be incorporated into the BLM plan assessment of environmental consequences including the cumulative impacts section.

6. Wilson et al. (2013)<sup>7</sup> modeled the effects of passerine nest loss and caribou calving habitat loss with respect to four development scenarios within the NPR-A (as outlined in the 2012 BLM IAP/EIS). These results indicate large differences in passerine nest loss and caribou calving habitat loss can be expected dependent on the alternative. We encourage you to review these results when developing new alternatives for the NPR-A IAP/EIS.
7. The current TLSA harbors important post-breeding shorebirds sites at Pogik Bay and Cape Halkett. In the larger region surrounding Teshekpuk Lake are other important sites that host thousands of shorebirds during the post-breeding period (including Cape Simpson, Tangent Point, Peard Bay; Taylor et al. 2010<sup>8</sup>). The post-breeding period is a critical stage in the life cycle of migratory shorebirds, as it enables them to acquire the fuel resources necessary for completing long flights to nonbreeding areas. The importance of quality post-breeding habitat reinforces the ASG's position that the region around Teshekpuk Lake is highly important to shorebirds at multiple stages of their life cycle and should be considered for exclusion from oil and gas leasing activities.

Under the terms of the Naval Petroleum Reserve Production Act (NPRPA) enacted in 1976, Congress transferred management of the NPR-A from the Navy to the Department of the Interior. Congress expressly recognized in the law that the NPR-A has exceptional natural, fish, wildlife (including shorebirds), scenic, cultural, and historical values warranting protection. Congress has provided the Secretary of the Interior broad authority to balance resource development activities with “maximum protection” of special areas in the NPR-A.<sup>9</sup>

To date, four Special Areas have been formally identified by the BLM within the NPR-A: the Teshekpuk Lake Special Area, the Colville River Special Area, the Utukok Uplands Special Area, and the Kasegaluk Lagoon Special Area. Despite the documentation of exceptional ecological values, however, these areas still lack permanent protection. Both oil production and ecosystem protection within the NPR-A can be realized. We strongly encourage you to take decisive action under the new Integrated Activity Plan to protect previously identified Special Areas.

We believe the 2012 NPR-A IAP/EIS provides an appropriate balance that will allow for substantial additional oil and gas development while also providing meaningful and reliable conservation for the exceptional biological resources of the NPR-A, including key shorebird populations. Maintaining the conditions within the 2012 NPR-A IAP/EIS would provide essential landscape-scale protection in the key areas of the NPR-A, especially the coastal plain around Teshekpuk Lake that is dense with breeding and post-breeding migratory birds. We urge

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<sup>7</sup> Wilson, R.R., J.R. Liebezeit, and W.M. Loya. 2013. Accounting for uncertainty in oil and gas development impacts to wildlife in Alaska. *Conservation Letters* 6:5 September/October 350-358. Doi: 10.1111/conl.12016.

<sup>8</sup> Taylor, A.R., R.B. Lanctot, A.N. Powell, F. Huettmann, D.A. Nigro, S.J. Kendall. 2010. Distribution and community characteristics of staging shorebirds on the northern coast of Alaska. *Arctic* 63: 451-467.

<sup>9</sup> Naval Petroleum Reserves Production Act of 1976. 42 USC § 6504.

you to consider these facts as you revisit the NPR-A IAP as it provides the appropriate balance of wildlife protection and energy development in this largest of public landscapes.

Thank you very much for the opportunity to present new information and our recommendations. If you have need for expertise about shorebirds in any future EIS, we would be very pleased to assist you. We look forward to continued interactions with the Bureau of Land Management in the future.

Respectfully,

A handwritten signature in black ink, appearing to read 'Lisa Kennedy', with a stylized flourish at the end.

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